

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

FILED IN OPEN COURT  
ON 3/14/16 SP  
Julie Richards Johnston, Clerk  
US District Court  
Eastern District of NC

NO. 5:16-CR-70-180(3)  
NO. 5:16-CR-70-280(3)  
NO. 5:16-CR-70-380(3)

UNITED STATES OF AMERICA, )  
 )  
 v. )  
 )  
 TYRONE TREVORE RAGLAND )  
 KING JUNIOR RAGLAND )  
 ANGELA RENEE SMITH )  
 )  
 )  
 )  
 )  
INDICTMENT

The Grand Jury charges that:

## CONSPIRACY

**COUNT ONE**

Beginning on a date unknown to the Grand Jury, and continuing thereafter until on or about August 8, 2015, in the Eastern District of North Carolina, and elsewhere, TYRONE TREVORE RAGLAND, KING JUNIOR RAGLAND, and ANGELA RENEE SMITH, the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute a mixture and substance containing a detectable amount of Buprenorphine, a Schedule III controlled substance, in

violation to the provisions of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

With respect to TYRONE TREVORE RAGLAND, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of Buprenorphine, in violation of Title 21, United States Code, Section 841(b)(1)(E).

With respect to KING JUNIOR RAGLAND, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of Buprenorphine, in violation of Title 21, United States Code, Section 841(b)(1)(E).

With respect to ANGELA RENEE SMITH, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is a quantity of Buprenorphine, in violation of Title 21, United States Code, Section 841(b)(1)(E).

All in violation of Title <sup>21</sup>~~26~~ <sup>Rp</sup> United States Code, Section 846.

COUNT TWO

On or about August 8, 2015, in the Eastern District of North Carolina, KING JUNIOR RAGLAND, defendant herein, did

knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of Buprenorphine, a Schedule III controlled substance in violation of Title 21, United States Code, Sections 841(a)(1).

COUNT THREE

On or about August 8, 2015, in the Eastern District of North Carolina, TYRONE TREVORE RAGLAND, defendant herein, being an inmate of a prison, that is the Federal Correctional Institution, Butner, North Carolina, knowingly attempted to obtain a prohibited object, to wit: Buprenorphine, a Schedule III controlled substance, in violation of Title 18, United States Code, Section 1791(a)(2) and (b)(3).

COUNT FOUR

On or about August 8, 2015, in the Eastern District of North Carolina, TYRONE TREVORE RAGLAND, defendant herein, being an inmate of a prison, that is, the Federal Correctional Institution, Butner, North Carolina, knowingly attempted to obtain a prohibited object, to wit: tobacco, in violation of Title 18, United States Code, Section 1791(a)(2) and (b)(5).

COUNT FIVE

On or about August 8, 2015, in the Eastern District of North Carolina, KING JUNIOR RAGLAND and ANGELA SMITH, defendants herein, aiding and abetting each other and others known and

unknown to the Grand Jury, attempted to provide to an inmate of a prison, that is, the Federal Correctional Institution, Butner, North Carolina, a prohibited object, to wit: Buprenorphine, a Schedule III controlled substance, in violation of Title 18, United States Code, Section 1791(a)(1) and (b)(3) and Section 2.

COUNT SIX

On or about August 8, 2015, in the Eastern District of North Carolina, KING JUNIOR RAGLAND and ANGELA RENEE SMITH, defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, attempted to provide to an inmate of a prison, that is, the Federal Correctional Institution, Butner, North Carolina, a prohibited object, to wit: tobacco, in violation of Title 18, United States Code, Section 1791(a)(1) and (b)(5) and Section 2.

COUNT SEVEN

On or about August 8, 2015, in the Eastern District of North Carolina, KING JUNIOR RAGLAND, defendant herein, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by declaring on a Department of Justice form that he did not possess prohibited objects before

entering a federal prison, to wit, at the Federal Correctional Institution in Butner, North Carolina, well knowing and believing that he did possess subject a prohibited object, to wit: Buprenorphine, a Schedule III controlled substance.

All in violation of Title 18, United States Code, Section 1001.

COUNT EIGHT

On or about August 8, 2015, in the Eastern District of North Carolina, ANGELA RENEE SMITH, defendant herein, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by declaring on a Department of Justice form that she did not possess prohibited objects before entering a federal prison, to wit, the Federal Correctional Institution in Butner, North Carolina, well knowing and believing that she did possess subject a prohibited object, to wit: tobacco.

All in violation of Title 18, United States Code, Section 1001.

FORFEITURE NOTICE

The defendants are given notice of the provisions of 21 United States Code, Section 853, that all of their interest in all property specified herein is subject to forfeiture.

As a result of the foregoing offenses set forth in Counts One and Two, the defendants shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of the said offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged, or any property traceable to such property.

If any of the above-described forfeitable property, as a result of any act or omission a defendant,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section

853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

ALLEGATION OF PRIOR CONVICTIONS

For purposes of Title 21, United States Code, Sections 841(b) and 851, TYRONE TREVORE RAGLAND, committed the violation alleged in Count One of the Indictment after one (1) or more separate prior convictions for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

A TRUE BILL:

**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE:

3-15-16

JOHN STUART BRUCE  
Acting United States Attorney

John J. Kuntz / for Robert Dodson  
BY: ROBERT J. DODSON  
Special Assistant United States Attorney  
Criminal Division